

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

MARIA SOCORRO QUIÑONES JIMENEZ

Debtor

CASE NO. 2011-04189-MCF

CHAPTER 13

REQUEST FOR COURT ORDER

TO THE HONORABLE COURT:

Comes now, Toyota Credit de Puerto Rico Corporation ("Toyota Credit"), through the undersigned attorneys and very respectfully states and prays:

1. On April 18, 2013, Debtor, the Chapter 7 Trustee and Toyota Credit filed a Stipulation to Lift Stay ("Stipulation"), over Toyota Credit's collateral. (Docket Entry No. 39)

2. Such Stipulation granted all parties in interest twenty one (21) days to file oppositions to the terms of the Stipulation and if no oppositions were filed, the Court may enter an order approving the same.

3. Such term of twenty one (21) days has expired, and no oppositions have been filed against the Stipulation.

4. Thus, it is respectfully requested from this Honorable Court to enter an order approving the Stipulation to Lift Stay filed by Debtor, the Chapter 7 Trustee and Toyota Credit on April 18, 2013.

WHEREFORE, the appearing party respectfully request that this Honorable Court enter an order approving the Stipulation to Lift Stay filed by Debtor, the Chapter 7 Trustee and Toyota Credit on April 18, 2013.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this same date the foregoing was electronically filed, utilizing the CM/ECF System, which upon information and belief will notify the same to all participants.

In San Juan, Puerto Rico, on this 17th day of June, 2013.

FERNANDEZ, COLLINS, CUYAR & PLA

/s/ Miguel S. Pastrana Torres
MAXIMILIANO A. PLA MENDEZ
USDCPR 224307
map@fccplawpr.com
MIGUEL S. PASTRANA TORRES
USDCPR 229710
[msp@fccplawpr.com](mailto:mSP@fccplawpr.com)
P.O. BOX 9023905
SAN JUAN, PUERTO RICO 00902-3905
TEL. 787-977-3772 FAX 787-977-3773